



January 14, 2015

Ahmanson Theatre | Mark Taper Forum | Kirk Douglas Theatre
OFFICES 601 West Temple Street, Los Angeles, CA 90012
CenterTheatreGroup.org

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Center Theatre Group located in Los Angeles, California, representing the Ahmanson Theatre, the Mark Taper Forum and the Kirk Douglas Theatre, I write with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

We use wireless microphones (Sennheiser), in-ear communicators (Shure P7T), control systems and wireless intercom systems in all of our three theatres. All are crucial to our ability to produce professional theatre, and irreplaceable by wired technologies. We may use anywhere from 2 to 30 wireless microphones in a given performance. We offer presentations that employ the use of wireless devices at least 300 days a year. Our wireless intercom and headset system is used on every presentation, and is central to successful, professional show running. If our theatre is open to the public, we are using wireless.

More specifically, we use (at the least) the following frequency ranges:

VHF 73 MHz-78MHz for wireless audio description and show program

LOW UHF 500.100 MHz to 517.900 MHz transmit (Wireless Clearcom)
 516 MHz to 558 MHz (Senheiser EW500)
 554.100 MHz to 570.600 MHz transmit (Wireless Telex)
 524 MHz to 554 MHz (Shure P7T in-ear)

HIGH UHF 674 MHz to 698 MHz (Senheiser 3532)
 650.1 MHz to 667.900 MHz receive (Wireless Clearcom)
 650.100 MHz to 667.900 MHz receive (Wireless Telex)

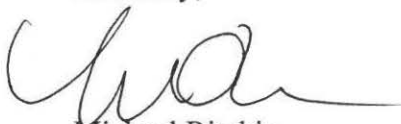
Our microphones are able to tune to limited frequency ranges, as detailed above. We also use wireless dimmers that are outside the TV bands, at 2.6 GHz. Our gear is analog, and we both own and rent our equipment.

When we had to move out of the 700 MHz band, we purchased all new equipment, costing Center Theatre Group almost \$30,000 in gear (not including the staff hours it took to replace all of our equipment). This took time and resources that I am sure you understand are very dear to a non-profit arts organization.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Ritchie", written in a cursive style.

Michael Ritchie
Artistic Director